Proposed Maximum Residue Limit PMRL2008-01

Coumaphos

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Health Canada's Pest Management Regulatory Agency (PMRA), under the authority of the *Pest Control Products Act* (PCPA), has granted registration to CheckMite + Beehive Pest Control Strip, a new end-use product containing technical grade coumaphos, for the control of varroa mites in honey bee colonies. The specific use that was approved in Canada is detailed on the CheckMite + Beehive Pest Control Strip label (PCPA Registration Number 27147).

The evaluation of this coumaphos application indicated that the end-use product has merit and value and that the human health and environmental risks associated with the new use are acceptable. Details regarding the registration can be found in the corresponding Evaluation Report that is available on the PMRA website, under Public Registry, Product Information, Current Applications.[1]

Before registering a pesticide for food use in Canada, the PMRA must determine the quantity of residues that are likely to remain in or on the food when the pesticide is used according to label directions and that such residues will not pose an unacceptable health risk. This quantity is then legally established as a maximum residue limit (MRL). An MRL applies to the identified raw agricultural food commodity as well as to any processed food product that contains it, except where separate MRLs are specified for the raw agricultural commodity and a processed product made from it.

Currently, MRLs are legally established under the Food and Drug Regulations (FDR) after consultation through the *Canada Gazette*. Amendments to the *Food and Drugs Act* (FDA) via Bill C-28, anticipated to come into force in 2008, will allow pesticide MRLs to be legally established under the PCPA without having to adopt MRLs by regulation under the FDA. This will result in a more efficient means of establishing, revising and revoking pesticide MRLs.

Consultation on the proposed MRLs for coumaphos is being conducted via this document (see Next Steps). This action is being taken in advance of Bill C-28 coming into force to allow the MRLs to be legally established as soon as possible after the FDA is amended.

The proposed MRLs for coumaphos in Canada in or on food, to be added to those currently established, are as follows.

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1 The relevant report can be accessed by selecting the Applications/Amendment/Historical tab and opening the Evaluation Report found under Application Number 2005-0691.

Table 1 Proposed Maximum Residue Limits for Coumaphos

Common Chemical Name	Chemical Name of Substance	Proposed MRL (ppm)	Food Commodities
Coumaphos	*O*-(3-chloro-4-methyl-2-oxo-2*H*-1-benzopyran-7-yl) *O,O*-diethyl phosphorothioate, including the oxygen analog *O*-(3-chloro-4-methyl-2-oxo-2*H*-1-benzopyran-7-yl) *O,O*-diethyl phosphate[2]	0.1 0.02	Honeycomb Honey

A complete list of all MRLs established in Canada can be found in Table II, Division 15 of the FDR. Once the amendments to the FDA via Bill C-28 are in force, the list of legally established Canadian MRLs will be available on the PMRA's MRL webpage, which will be updated to include the MRLs listed in this document in addition to the revised chemical name and residue definition.

International Situation and Trade Implications

MRLs may vary from one country to another for a number of reasons, including differences in pesticide use patterns and the locations of trials used to generate residue chemistry data. As per Table 2, the proposed MRLs in Canada differ from the corresponding tolerances established in the United States (listed in 40 CFR Part 180 by pesticide). Currently, there are no Codex[3] MRLs established for coumaphos on any commodities (Codex MRLs searchable by pesticide or commodity).

Table 2 Comparison of Canadian MRLs, American Tolerances and Codex MRLs

Food Commodity	Proposed Canadian MRL (ppm)	American Tolerance (ppm)	Codex MRL (ppm)
Honeycomb	0.1	45	No Codex MRL established
Honey	0.02	0.15	No Codex MRL established

2 The chemical name for coumaphos is currently captured in Table II, Division 15 of the FDR as "*O*-3-chloro-4-methylcoumarin-7-yl *O,O*-diethyl phosphorothioate". This is to be revised to reflect Chemical Abstracts Service (CAS) nomenclature in accordance with Table 1 above. In addition, the residue definition for established livestock commodity MRLs is currently captured as parent only but is to be revised to include coumaphos's oxygen analog as per Table 1 above.

3 Codex is an international organization under the auspices of the United Nations that develops international food standards, including MRLs.

Next Steps

Health Canada's PMRA invites the public to submit written comments on the proposed MRLs for coumaphos up to 75 days from the date of publication of this document. Please forward your comments to Publications (see contact information on the cover page of this document). The PMRA will consider all comments received before making a final decision on the proposed MRLs for coumaphos and before posting an Established Maximum Residue Limit (EMRL) document on the PMRA's website once the amendments to the FDA are in force.